



ONE UTAH CENTER • THIRTEENTH FLOOR
201 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84111-2216
TEL 801.322.2516 • FAX 801.521.6280
www.clydesnow.com

RODNEY G. SNOW
STEVEN E. CLYDE
EDWIN C. BARNES
NEIL A. KAPLAN*
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SHAUNDA L. MCNEILL
LAURA D. JOHNSON
TRENTON L. LOWE

OF COUNSEL:
CLARK W. SESSIONS†
REAGAN L.B. DESMOND^Δ[®]

EDWARD W. CLYDE (1917-1991)

† SENIOR COUNSEL
* ALSO ADMITTED IN DISTRICT OF COLUMBIA
[®] ALSO ADMITTED IN NEW YORK
^Δ ALSO ADMITTED IN CALIFORNIA
^Δ ALSO ADMITTED IN OREGON
• ALSO ADMITTED IN WYOMING

March 21, 2018

Via CM/ECF

Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1610
New York, NY 10007

Re: *Alpine Securities Corporation adv. United States Securities and Exchange Comm.*
Civil No. 1:17-cv-04179-DLC

**STIPULATED LETTER MOTION REQUESTING A 21-DAY EXTENSION OF THE
DEADLINE FOR COMPLETION OF FACT DISCOVERY AND CORRESPONDING
DEADLINES UNDER THE CURRENT SCHEDULING ORDER**

Dear Judge Cote:

This letter is being jointly filed by Defendant Alpine Securities Corporation (“Alpine”) and Plaintiff Securities and Exchange Commission (“SEC”) to request a twenty-one (21) day extension to the remaining dates under the pretrial scheduling order, as set forth in greater detail below. The grounds for the parties’ request are that the parties need additional time, until April 20, 2018, for the completion of depositions of witnesses in order to accommodate the schedule of the witnesses and counsel, and because of a postponement of a deposition that was originally scheduled for March 22, 2018 until April 19, 2018 due to inclement weather affecting travel from New York City. The parties have completed three depositions and have each filed dispositive motions as of the date of this Letter Motion. The parties also request that all other scheduling dates be extended accordingly, to accommodate the 21-day extension to fact discovery.

Pursuant to the Court’s Individual Practices 1.E:

1. The original due date for the close of fact discovery is March 30, 2018.
2. This is the parties’ first request for an extension of fact discovery.
3. Both parties stipulate to the extension of fact discovery and corresponding extensions to the Pretrial Scheduling Order as stated below.



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If the requested extension is granted, the proposed Revised Pretrial Scheduling Order will be as follows:

1. All fact discovery must be completed by **April 20, 2018**.
2. Expert reports and disclosure of expert testimony conforming to the requirements of Rule 26(a)(2)(B), Fed. R. Civ. P., by the party bearing the burden on an issue must be served by **May 11, 2018**. Identification of rebuttal experts and disclosure of their expert testimony must occur by **June 1, 2018**.
3. All discovery must be completed by **June 22, 2018**.
4. The following motion will be served by the dates indicated below:

Any motion for summary judgment:

- Motion served by **August 3, 2018**
 - Opposition served by **August 24, 2018**
 - Reply served by **September 7, 2018**
5. In the event no motion is filed, the Joint Pretrial Order must be filed by **August 3, 2018**.

Pursuant to the Court's Individual Practices 1.E, a proposed Revised Pretrial Scheduling Order is filed concurrently herewith. The parties respectfully request that the Court approve an extension of fact discovery and enter the proposed Revised Pretrial Scheduling Order.

Respectfully submitted,

/s/ Brent R. Baker

Brent R. Baker (BB 8285)

Aaron D. Lebenta (*pro hac vice*)

Jonathan D. Bletzacker (*pro hac vice*)

CLYDE SNOW & SESSIONS

One Utah Center, 13th Floor

201 South Main Street

Salt Lake City, Utah 84111-2216

Telephone 801.322.2516

Facsimile 801.521.6280

Email: brb@clydesnow.com

adl@clydesnow.com

jdb@clydesnow.com



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Maranda E. Fritz
335 Madison Avenue, 12th Floor
New York, New York 10017-4611
Tel. (212) 344-5680
Fax (212) 344-6101
Maranda.Fritz@thompsonhine.com

Attorneys for Alpine

/s/ Terry R. Miller
Zachary T. Carlyle (*pro hac vice*)
Terry R. Miller (*pro hac vice*)
Attorneys for Plaintiff
UNITED STATES SECURITIES AND
EXCHANGE COMMISSION
1961 Stout Street, 17th Floor
Denver, Colorado 80294
(303) 844-1000
Electronically signed with permission

cc: Counsel of Record (via CM/ECF)